

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

ASHLEY BOSHEA as representative of the  
ESTATE OF DAVID J. BOSHEA,

Plaintiff,

v.

Case No.: 1:21-CV-00309-ELH

COMPASS MARKETING, INC.,

Defendant.

**CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE ATTORNEYS' FEE PETITION AND BILL OF COSTS**

Plaintiff, Ashley Boshea, as the representative of the Estate of David Boshea, respectfully moves for an order extending the time for Plaintiff to submit a Petition for Attorneys' Fees and Bill of Costs for five days to and including December 29, 2025.

The deadline for submitting the petition is currently Friday, December 19, 2025.

This extension will not prejudice either party. If Defendant's Motion is denied additional fees for opposing the motion will be subject to Plaintiff's petition. If it is granted Plaintiff's claim for reimbursement for fees and costs will be moot.

Defendant Compass Marketing's counsel, one of whom is in trial and the other out of town, have been asked to consent. They are waiting for their client's instructions.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and extend the deadline to file his petition on or before December 29, 2025.

Respectfully submitted,

Thomas J. Gagliardo  
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/s/ Gregory J. Jordan  
Gregory J. Jordan (Admitted Pro Hac Vice)  
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Counsel for plaintiff

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the **Consent Motion for Extension of Time to File Attorneys' Fee Petition and Bill of Costs** was served via this Court's ECF system and by electronic mail on December 18, 2025 addressed to the following:

**Defendant's Counsel:**

Stephen B. Stern  
[stern@kaganstern.com](mailto:stern@kaganstern.com)

/s/Kate Wehba  
Kate Wehba  
Paralegal

 Outlook

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**RE: ESTATE of DAVID BOSHEA v Compass Marketing TIME SENSITIVE**

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**From** Stephen Stern <[Stern@kaganstern.com](mailto:Stern@kaganstern.com)>

**Date** Thu 12/18/2025 3:26 PM

**To** Tom Gagliardo <[tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)>

**Cc** Gregory Jordan <[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)>; Kate Wehba <[kwehba@gelawyer.com](mailto:kwehba@gelawyer.com)>

We consent



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**From:** Tom Gagliardo <[tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)>  
**Sent:** Thursday, December 18, 2025 3:09 PM  
**To:** Stephen Stern <[Stern@kaganstern.com](mailto:Stern@kaganstern.com)>  
**Cc:** Gregory Jordan <[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)>; Kate Wehba <[kwehba@gelawyer.com](mailto:kwehba@gelawyer.com)>  
**Subject:** ESTATE of DAVID BOSHEA v Compass Marketing TIME SENSITIVE

Stephen

We need an extension to file our attorneys' fee petition. Will you consent to extension of a 5 business days to and including December 29, 2025?

Thanks.

Tom

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